

Case 1:20-cv-00675-PAE Document 84 Filed 01/25/23 Page 1 of 2

BELDOCK LEVINE & HOFFMAN LLP 99 PARK AVENUE, PH/26TH FLOOR

NEW YORK, N.Y. 10016

JONATHAN MOORE
DAVID B. RANKIN
LUNA DROUB!
MARC A. CANNAN
CYNTHIA ROLLINGS
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: 12121 490-0400 FAX: (212) 277-5880 WEBSITE: bihny.com

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLD
MARJORY D. FIELDS
EMILY JANE GOODMAN

January 25, 2023

LUSTICE NYS SUPREME COURT, RET.)

FRANK HANDELMAN

REF:

8390.05 WRITER'S DIRECT DIAL: 212-277-7275 Idroubi@blhny.com

VIA ECF

Honorable Paul A. Engelmayer United States District Court Southern District of New York 40 Foley Square, Room 2201 New York, NY 10007

Re: Ahmad et al. v. NYCHHC et al., 20-cv-00675 (PAE)

Dear Judge Engelmayer:

This firm represents the seven Plaintiffs with remaining claims in the above-referenced action. We write, jointly with Defendants, to update the Court on the Parties' settlement discussions and request an adjournment of the pre-motion conference on Defendants' anticipated motion for summary judgment, currently scheduled for February 1, 2023 at 4:00 P.M., Dkt. No. 78, until after the Parties' next settlement conference, scheduled for March 7, 2023 before Magistrate Judge Willis, see January 25, 2023 Minute Entries.

On January 24, 2023, counsel for the Parties, the Plaintiffs, and an H+H representative, attended a productive in-person settlement conference with Magistrate Judge Willis. The Parties engaged in good faith discussions and after a full day of settlement discussions, agreed to schedule a subsequent conference focused on four of the seven Plaintiffs. The Parties anticipate that they will thereafter schedule an additional settlement conference focused on the other three Plaintiffs.

The Parties therefore request that the Court reschedule the pre-motion conference to a date after the March 7, 2023 settlement conference to allow the Parties to focus on settlement and spare the Court from expending resources discussing a motion that may no longer be necessary as to some or all Plaintiffs following the settlement conferences before Magistrate Judge Willis.

We thank the Court for its attention in this matter.

Case 1:20-cv-00675-PAE Document 85 Filed 01/26/23 Page 2 of 2

Case 1:20-cv-00675-PAE Document 84 Filed 01/25/23 Page 2 of 2

BELDOCK LEVINE & HOFFMAN LLP

Hon. Paul A. Engelmayer January 25, 2023 Page 2

Respectfully submitted,

Luna Droubi

cc: All Parties via ECF

The Court adjourns the pre-motion conference to March 9, 2023 at 4 p.m.

SO ORDERED.

PAUL A. ENGELMAYER

United States District Judge

January 26, 2023